FOR THE SOUTHERN DISTRICT OF NEW	YORK 	x	
LUKE RICHARDSON,			
	Plaintiff,		
-against-			NOTICE OF MOTION
			15 CV 5775 (PKC)
THE CITY OF NEW YORK, a municipal entity, et al.,			
	Defendants.		

PLEASE TAKE NOTICE that upon the annexed memorandum of law dated January 29, 2016; the Declaration of Joy Anakhu dated January 29, 2016, with exhibits; the Memorandum of Law, dated January 29, 2016; and upon all prior pleadings and proceedings had herein, defendants will move this court before the Honorable P. Kevin Castel, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, on January 29, 2016, to dismiss pursuant to Fed. R. Civ. P. 12, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** pursuant to the Court's December 23, 2015 order opposition papers are due by February 26, 2016, reply papers are due March 10, 2016.

Dated: New York, New York January 29, 2016

INITED OF ATEC DISTRICT COLIDS

ZACHARY CARTER Corporation Counsel - City of New York Attorney for Defendants 100 Church Street New York, New York 10007 (212) 356-2323

By: <u>/s/</u>

Joy Anakhu; Andrew Lucas Senior Counsel New York City Law Department

TO:

Honorable P. Kevin Castel United States District Judge 500 Pearl Street New York, New York 10007

David Thompson Stecklow & Thompson 217 Centre Street, 6<sup>th</sup> Floor New York, NY 10013